

2024R00199/KLA

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

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APR 16 2025
ROBERT KIRSCH
U.S. DISTRICT JUDGE

UNITED STATES OF AMERICA : Hon. Robert Kirsch
:
v. : Crim. No. 25- *CR-239*
:
DEBORAH BAILEY : 18 U.S.C. § 641

INFORMATION

The defendant having waived in open court prosecution by Indictment, the United States Attorney for the District of New Jersey charges:

(Theft of Public Money)

Introduction

At all times relevant to this Information:

1. The Social Security Administration (“SSA”) was an agency of the United States within the United States government that administered programs under the Social Security Act, Title 42, United States Code, Section 301, *et seq.* (the “Act”).
2. The SSA, among other things, maintained the Retirement, Survivors, and Disability Insurance (“RSDI”) program under Title II of the Act for eligible individuals. The RSDI program paid out benefits to certain eligible individuals.
3. Defendant Deborah Bailey (“BAILEY”) was a resident of Piscataway, New Jersey.
4. BAILEY’s mother, referred to herein as “R.B.,” was born on November 1, 1930, and began collecting Title II Retirement Insurance Benefits (“RIBs”) from the SSA in or around January 1997. R.B. died on or about July 1, 2016. After R.B.’s

death, neither BAILEY, nor any other individual, was entitled to receive RIBs on R.B.'s behalf.

5. The SSA paid R.B.'s benefits by direct deposit into a bank account ending in 4242 (the "4242 Account"), for which BAILEY was a joint account holder.

The Scheme to Defraud

6. From in or around July 2016 to in or around January 2024, in the District of New Jersey, and elsewhere, the defendant,

DEBORAH BAILEY,

did knowingly and intentionally embezzle, steal, purloin, and convert to her own use money of the United States exceeding \$1,000, that is, approximately \$150,903.00 in SSA program benefits to which she was not entitled.

Goal of the Scheme

7. The goal of the scheme was for BAILEY to obtain money from the SSA to which she was not entitled by failing to notify the SSA about R.B.'s death, and by continuing to utilize the funds deposited by the SSA for her own purposes.

Manner and Means

8. Following R.B.'s death in or around July 2016, BAILEY did not notify the SSA of R.B.'s death. As a result, the SSA continued to make monthly RIBs payments into the 4242 Account.

9. BAILEY continued to collect R.B.'s RIBs payments until in or around January 2024. While doing so, BAILEY knew that she was not entitled to R.B.'s RIBs payments but continued to collect them fraudulently for her own use.

All in violation of Title 18, United States Code, Section 641.

FORFEITURE ALLEGATION

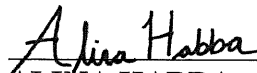
Upon conviction of Theft of Public Money, in violation of Title 18, United States Code, Section 641, as charged in this Information, the defendant, DEBORAH BAILEY, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), all property, real and personal, the defendant obtained that constitutes or is derived from proceeds traceable to the commission of said offense, the value of which totaled \$150,903.00.

SUBSTITUTE ASSETS PROVISION

If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty,

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above-described forfeitable property.


ALINA HABBA
United States Attorney

CASE NUMBER: 25- CR-239

**United States District Court
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v.

DEBORAH BAILEY

INFORMATION FOR

18 U.S.C. § 641

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